

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, *et al.*,

*Defendants.*

Civ. No. 1:16-cv-00563 (LO/TCB)

**CONSENT MOTION FOR EXTENSION OF DEADLINES**

Plaintiffs, by counsel, with the consent of Defendants, by counsel, hereby move this Court to extend the deadlines for supplemental briefing. In support of this motion, Plaintiffs respectfully represent as follows:

1. On July 28, after hearing argument on the parties' cross-Motions in Limine, this Court entered a *sua sponte* Order requesting supplemental briefing regarding various topics. Dkt. No. 413. The Court ordered that Defendants file a brief within ten days (Monday, August 9); that Plaintiffs file a responsive brief within ten days thereafter (Thursday, August 19); and that Defendant file a reply brief within seven days thereafter (Thursday, August 26). *Id.* at 3.

2. Plaintiffs' lead counsel Simon Sandoval-Moshenberg is scheduled to be in New England on a long-overdue family vacation from August 6 through 22, precisely when Plaintiffs would have to draft and file their brief. Co-lead counsel Nady Peralta is also taking her first vacation in over a year, for the month of August. Plaintiffs' counsel Granville C. Warner will be out of the office on medical leave the week of August 8. Accordingly, three of the four Plaintiffs' lawyers still working on this case are unavailable at the precise time when Plaintiffs

have been ordered to file their brief; and the fourth, Larisa Zehr, filed an appearance into this case less than one month ago.

3. This matter is set for trial on March 14, 2022. Extending the briefing deadlines would not delay the trial date or in any way burden trial preparation.

4. Defendants' counsel have a previously scheduled arbitration in another matter, and accordingly the parties have agreed to the proposed deadlines set forth below.

5. For the foregoing reasons, Plaintiffs, with the consent of Defendants, respectfully request that this Court extend the briefing deadlines set forth in the *sua sponte* Order, Dkt. No. 413, as follows:

- a. Defendants' opening brief shall be filed on or before August 24, 2021;
- b. Plaintiffs' brief in response shall be filed on or before September 7, 2021; and
- c. Defendants' reply brief shall be filed on or before September 17, 2021.

Respectfully submitted,

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*Counsel for Plaintiffs*

Dated: 7/30/2021

**Certificate of Service**

I hereby certify that on this 30th day of July, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

//s//

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